

June 25, 2015

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**VIA EMAIL: TALTON.CHUCK@EPA.GOV**

Mr. Kenneth Talton, Enforcement Officer  
Superfund Enforcement Assessment Section (6SF-TE)  
U.S. EPA, Region 6  
1445 Ross Avenue  
Dallas, TX 75202-2733

Re: SBA Shipyard Superfund Site

Dear Mr. Talton:

In response to EPA's May 15, 2015 correspondence address to Sabine Towing & Transportation Co., Inc., c/o Sequa Corporation responds as follows:

**QUESTIONS**

**GENERAL INFORMATION CONCERNING RESPONDENT**

1. Provide the full legal name and mailing address of the Respondent.

Sequa Corporation  
300 Blaisdell Road  
Orangeburg, NY 10962

2. Identify and provide the full name, title, business address, and business telephone number for each person answering these questions on behalf of the Respondent, and each person(s) that was relied on or consulted with in the preparation of the answer.

Brian Buniva  
Sequa Corporation  
300 Blaisdell Road  
Orangeburg, NY 10962  
(845) 230-7374

-and-

F. William Mahley  
Strasburger & Price, LLP  
909 Fannin, Suite 2300  
Houston, Texas 77010  
(713) 951-5600

3. If Respondent wishes to designate an individual for all future correspondence concerning this Site, including legal notices, please provide the individual's name, address, and telephone number.

F. William Mahley  
Strasburger & Price, LLP  
909 Fannin, Suite 2300  
Houston, Texas 77010  
(713) 951-5600

4. If Respondent is a business, please give a brief description of the nature of the business.

Sequa Corporation owns two business units, one involved in the airline equipment repair and services business, and one involved in the metal coating business. Sabine Towing & Transportation Co., Inc., a wholly-owned but inactive Sequa subsidiary, formerly operated a fleet of inland tank barges and towing vessels, engaged in transporting various refined petroleum products for a number of product producers and intermediaries, throughout the U.S. inland waterways network. Sabine Towing's assets were sold in 1992 and it ceased operations at that time.

### **REQUESTS FOR DOCUMENTS**

Please identify (see Definitions) and provide copies of all documents (see Definitions) consulted, examined, or referred to in the preparation of the answers to the above questions including all subparts of each question, or that contain information responsive to the question.

1. Please identify any dealings or transactions you have or had with SBA Shipyards, Inc., Louis Smailhall, Suzanne Smailhall, LEEVAC Shipyards, Inc., n/k/a Bunge Street Properties, LLC, and LEEVAC Industries, LLC n/k/a LEEVAC Shipyards Jennings, LLC. Please provide a brief description of the nature of those dealings or transactions and the timeframes during which those dealings and transactions occurred.

Sequa is investigating this issue, but thus far has not confirmed any relationship between it and any of the listed entities or individuals.

- a. Specifically, provide dates of when you sent or moved something to the Site and the name and contact information of the person who made such arrangements.

See above. Sequa is investigating this issue as to Sabine Towing.

2. Please provide any and all documents in your possession that are related to the dealings and transactions detailed in Question 1 above.

Sequa is investigating this issue.

3. If any of the dealings or transactions described involved hazardous materials, please include a detailed listing of such materials, the materials data safety sheet, dates of transaction, and any quantity associated with those materials.

Sequa is investigating this issue.

4. Please describe in detail any involvement you had with the 2002 RCRA Interim Measures/Removal Action (IM/RA) at the Site. Please provide any and all documents in your possession related to the IM/RA, including, but not limited to, a listing of the parties involved in the IM/RA.

Sabine Towing was involved with that Removal Action, as a member of SSIC Remediation, L.L.C. A search will be made for any documents from that Removal Action that we still have.

5. Please provide the names, title, and contact information of anyone, including, but not limited to, employees, who may possess knowledge and information regarding this Site and/or your own business operations.

Sequa is investigating this issue to ascertain whether it can identify any individuals who possess such information.

6. Identify all of the individuals who currently have and those who have had responsibility for the Respondent's environmental matters (e.g., responsibility for the disposal, treatment, storage, recycling, or sale of the Respondent's wastes). This information shall include, but not be limited to, the following:

Sequa does not produce waste materials, and therefore objects to this question to that extent. Several of Sequa's current management team are responsible for

"environmental matters," but only counsel deals with "legacy" issues such as this one.

a. Each individual's job title and duties (including the dates performing those duties).

b. The supervisors for such duties.

N/A

c. The current position or the date of the individual's resignation, and

N/A

d. The nature of the information possessed by such individuals concerning the Respondent's waste management.

N/A

e. The contact information of the individual.

Please see response to No. 2 above.

7. Does the Respondent's company or business have a permit(s) issued under RCRA? If so, provide a copy(ies) of the permit(s).

Sequa does not possess a RCRA permit.

8. Provide all Resource Conservation and Recovery Act (RCRA) Identification Numbers issued to Respondent by EPA or a state for Respondent's operations.

N/A

9. Does the Respondent's company or business have, or has it ever had, a permit(s) under the hazardous waste laws of the State? If so, provide a copy(ies) of the permit(s).

Sequa does not possess any such permits.

10. Does the Respondent's company or business have an EPA Identification Number, or an identification number supplied by the State? If so, supply any such identification number(s).

No.

11. Identify all federal, state, and local offices and agencies to which the Respondent has sent or filed hazardous substance or hazardous waste information and state the years during which such information was sent or filed.

Sequa objects to this request as irrelevant and not applicable to the issue at hand.

12. Provide copies of all documents created or kept by the Respondent related to the nature, quantity, or source of the materials taken to the Site.

Sequa is investigating this issue. No such documents have been located as of the date of this response.

13. If barges were placed or disposed at the Site, provide the following information.

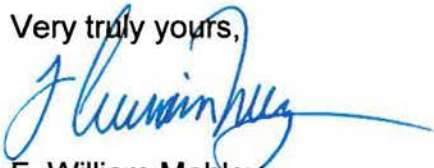
Sequa is investigating this issue.

- a. Where they were placed or disposed, and
- b. Their condition when placed or disposed.

14. Identify other individuals and entities that the Respondent has reason to believe may have taken or sent materials to the Site. Of these individuals and entities, specify which were observed by the Respondent at the Site and indicate when those observations were made. Provide all of the information known by the Respondent regarding the customers of these entities or individuals.

Sequa is investigating this issue.

Very truly yours,



F. William Mahley  
FWM/rrh

cc: Brian Buniva